



September 18, 2019

Federal Communication Commission
Attn: Ms. Marlene H. Dortch
445 12th Street SW
Washington, DC 20554

Dear Ms. Dortch:

TeleSphere Software, Inc. dba KADENCE is attentively interested in the FCC Access Stimulation Draft Order released on September 5, 2019. We submit the following letter in the hopes of sharing our perspective based on over two decades of carrier access billing system (CABS) experience. Our current customer portfolio consists of approximately thirty (30) service providers operating across the United States and Puerto Rico. In conjunction with CABS billing, we process over one billion call detail records (CDRs) each month on the behalf of a diverse collection of ILECs, CLECs, tandem and MSO organizations.

The draft order contemplates changing the definition of an access stimulator and centers on a 6:1 ratio of terminating to originating traffic. The proposed rule change may indeed identify access stimulators but our concerns lies with the unintended or misunderstood consequences of implementing such a broad and generalized definition. These unintended consequences could have a significant impact on KADENCE and our customers.

There are numerous variable associated with calculating a ratio.....traffic type being a primary one. That said, a statistically significant sample of our customer portfolio reveals that many would exceed the proposed 6:1 ratio. Without hesitation I can confidently say that these service providers are not willfully nor intentionally undertaking access stimulation practices but rather simply attempting to realize intercarrier compensation revenue based on real world business scenarios and drivers.

Thank you for your consideration.

Sincerely,

Todd Twete
KADENCE
Vice President of Sales
www.gokadence.com